

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,
Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY,
Defendant.

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Case No. 2:24-cv-00093-JRG
(Lead Case)

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,
Plaintiff,

v.

INTERNATIONAL BUSINESS
MACHINES
CORP.,
Defendant.

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Case No. 2:24-CV-00064-JRG
(Member Case)

JURY TRIAL DEMANDED

**DECLARATION OF MACKENZIE PALADINO IN SUPPORT OF PLAINTIFF
VIRTAMOVE, CORP.'S SUR REPLY TO IBM CORP.'S MOTION TO TRANSFER
(DKT. 78)**

I, Mackenzie Paladino, declare and state as follows:

1. I am a member of the State Bar of New York and an attorney at the firm of Russ August & Kabat, and one of the attorneys for Plaintiff VirtaMove, Corp. in the above-captioned action. I submit this declaration in support of Plaintiff's Sur-Reply to IBM Corp.'s Motion to Transfer. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 20 are true and correct, highlighted excerpts from the deposition of Susan Cameron on October 10, 2024.

3. Attached as Exhibit 21 is a true and correct copy of VirtaMove's First Supplemental Initial and Additional Disclosures.

4. Attached as Exhibit 22 is a true and correct, redacted copy of an email chain between VirtaMove's counsel and IBM's counsel.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed on October 23, 2024 in New York, New York.

/s/ Mackenzie Paladino
Mackenzie Paladino

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Texas under seal, and served counsel of record with a copy via electronic email.

/s/ Mackenzie Paladino
Mackenzie Paladino

CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

I hereby certify that the foregoing document is authorized to be filed under seal pursuant to the Protective Order entered in this case.

/s/ Mackenzie Paladino
Mackenzie Paladino